

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
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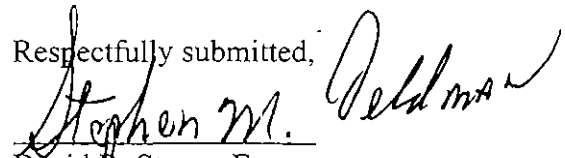
POSTAL RATE AND FEE CHANGES, 1997)
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Docket No. R97-1

THE AMERICAN BUSINESS PRESS' THIRD SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO USPS WITNESS TAUFIQUE
(ABP/USPS-T34-23-24)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatories and requests for production of documents to USPS Witness Taufique (ABP/USPS-T34-23-24). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



David R. Straus, Esq.

Stephen M. Feldman, Esq.

THOMPSON COBURN

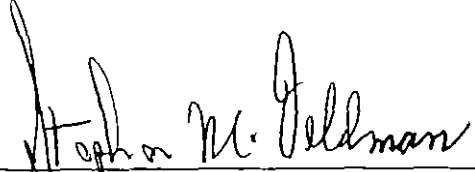
700 14th Street, N.W., Suite 900

Washington, D.C. 20005

Counsel for the American
Business Press

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.



Stephen M. Feldman

Dated: September 17, 1997

THIRD INTERROGATORIES
OF AMERICAN BUSINESS PRESS (ABP)
TO USPS WITNESS ALTAF TAUFIQUE (USPS-T34)

ABP/USPS-T34-23

Does your workpaper RR-G explicitly explain or show how advertising zone rates for regular-rate periodicals are derived and calculated? If your answer is affirmative, identify the line or cell location that would explain the derivation of these rates from underlying data, in particular distance-related purchased transportation costs. If your answer is negative, please identify the workpaper, whether prepared by you or by another witness, that displays the requested calculations and the underlying distance-related transportation costs attributed to regular-rate periodicals that would answer this interrogatory.

ABP/USPS-T34-24

Do you agree that zoned pound rates for regular-rate periodicals are not accurate models of the progression of distance-related transportation costs over distance, particularly since the highway cost database, HCSS, described by Witness Bradley in USPS-T13, does not contain any mail-specific information, according to your earlier response to ABP/USPS-T34-10(b); *see also* FGSA/USPS-T13-11 (redirected from Witness Bradley to USPS for response)? If you do not agree, explain why you do not agree.